

From: Ignatius Grande <igrande@thinkbrg.com>
Sent: Tuesday, May 20, 2025 4:22 PM
Subject: RE: IME WatchDog, Inc. v. Gelardi, et al. (1:22-cv-1032)

CAUTION - EXTERNAL:

Dear Judge Chen,

I am writing to let you know that I checked with our Finance Department today, Tuesday, May 20th, and BRG still has not received the \$500 payment that the Defendants in IME Watchdog, Inc. v. Gelardi, et al. had been ordered to make.

I am following up on your Order to Show Cause, which was issued on May 5, 2025, which stated in part:

“...., on May 2, 2025, the Court received the attached correspondence from Mr. Grande, in which Mr. Grande informed the Court that while Safa paid BRG the \$2,000 payment the Court ordered during the April 2, 2025 Show Cause Hearing, she did not pay BRG the \$500 payment due May 1, 2025. In accordance with the Court's Order during that Show Cause Hearing, (see 4/2/2025 Minute Entry), **by May 12, 2025**, Defendant Safa Gelardi shall pay \$500 in sanctions to the Clerk of Court, United States District Court, Eastern District of New York, and the Individual Defendants shall pay BRG the \$500 payment that was due on May 1, 2025. The Individual Defendants are directed to file proof of both payments on the docket **by May 16, 2025**.

By May 19, 2025, the Individual Defendants shall file with the Court: (1) the within-described summary of their financials and any and all sales of their property(ies) since March 8, 2024, and (2) their response to the Court's Order to Show Cause why they should not be required to deposit all proceeds from any sales of their properties since March 8, 2024 with the Court Registration Investment System ("CRIS") during the pendency of this case.” (*highlighting added*).

If you need any additional information from BRG, please do not hesitate to reach out.

Thank you,

Ignatius Grande

Ignatius Grande | Director

BRG

810 Seventh Avenue, Suite 4100 | New York, NY 10019

D 646.809.8066 | M 718.249.7203

igrande@thinkbrg.com | thinkbrg.com

